

# Sage Legal LLC

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May 9, 2024

**VIA ECF**

United States District Court  
Southern District of New York  
Attn: Hon. Edgardo Ramos, U.S.D.J.  
40 Foley Square, Courtroom 619  
New York, NY 10007

**Re: Noh v. adMarketplace, Inc., et ano.**  
**Case No.: 1:24-cv-2107 (ER) (SLC)**  
**Letter Motion for Extension of Time to Respond to Complaint**

Dear Judge Ramos:

This office represents Defendant Eugene Kilberg (“Kilberg”) in the above-referenced case. Kilberg writes to respectfully request an extension of time to respond to the complaint.

Pursuant to ¶ 1(E) of this Court’s Individual Practices, Kilberg respectfully submits as follows: (i) the original deadline to respond to the complaint, according to the docket in this case, falls today, May 9, 2024; (ii-iii) there have been no previous requests for an extension of time to respond to the complaint; (iv) Kilberg only recently retained counsel and your undersigned has not had an opportunity to investigate the allegations in the complaint; (v) Kilberg was unable to request Plaintiff’s consent because your undersigned was engaged in preparation for oral argument before the Supreme Court of the State of New York, Appellate Division, First Department which took place at 2:00 PM today. Kilberg notes, however, that co-Defendant adMarketplace, Inc. secured an extension of time until June 14, 2024 to respond to the complaint with Plaintiff’s consent.

In light of the foregoing, Kilberg respectfully submits that sufficient good cause exists warranting this Court’s exercise of discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. (6)(b)(1)(A). Kilberg thanks this Court for its time and attention to this case.

Dated: Jamaica, New York  
May 9, 2024

Respectfully submitted,

**SAGE LEGAL LLC**

/s/ Emanuel Kataev, Esq.

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